

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

HOSPITALITY INVESTORS TRUST, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 21-10831 (CTG)

(Joint Administration Requested)

Re: Docket No. 16

**NOTICE OF FILING REVISED PROPOSED INTERIM ORDER (I) AUTHORIZING
THE DEBTORS TO (A) OBTAIN POSTPETITION FINANCING, (B) USE CASH
COLLATERAL, AND (C) GRANT LIENS AND SUPERPRIORITY ADMINISTRATIVE
EXPENSE CLAIMS; (II) MODIFYING THE AUTOMATIC STAY; (III) SCHEDULING
A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on May 19, 2021, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Superpriority Administrative Expense Claims; (II) Modifying the Automatic Stay; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 16] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed form of order was attached to the Motion as Exhibit A (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that, a hearing regarding the Motion has been scheduled before the Honorable Craig T. Goldblatt, United States Bankruptcy Court Judge, at the United States Bankruptcy Court, on **May 20, 2021 at 1:00 p.m. (ET)**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Hospitality Investors Trust, Inc. (3668); and Hospitality Investors Trust Operating Partnership, L.P. (0136). The Debtors’ executive offices are located at Park Avenue Tower, 65 East 55th Street, Suite 801, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that the Debtors received informal comments (the “Informal Comments”) from the United States Trustee. In response to those comments, the Debtors have made further revisions to the Proposed Order and such revised proposed order is attached hereto as **Exhibit A** (the “Revised Order”). For the convenience of the Court and all parties in interest, a blackline of the Revised Order against the Proposed Order is attached hereto as **Exhibit B**. The Revised Order and the blackline are being filed without exhibits.

[Remainder of Page Intentionally Left Blank]

Dated: May 20, 2021
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ R. Stephen McNeill

Jeremy W. Ryan (DE Bar No. 4057)
R. Stephen McNeill (DE Bar No. 5210)
1313 North Market Street
Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: jryan@potteranderson.com
rmcneill@potteranderson.com

-and-

PROSKAUER ROSE LLP

Jeff J. Marwil (admitted *pro hac vice*)
Paul V. Possinger (admitted *pro hac vice*)
Jordan E. Sazant (DE Bar No. 6515)
70 West Madison, Suite 3800
Chicago, IL 60602
Telephone: (312) 962-3550
Facsimile: (312) 962-3551
Email: jmarwil@proskauer.com
ppossinger@proskauer.com
jsazant@proskauer.com

-and-

PROSKAUER ROSE LLP

Joshua A. Esses (admitted *pro hac vice*)
Eleven Times Square
New York, NY 10036
Telephone: (212) 969-3000
Facsimile: (212) 969-2900
Email: jesses@proskauer.com

Proposed Attorneys for Debtors and Debtors in Possession